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*Counsel for Plaintiff Geo-Group  
Communications, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GEO-GROUP COMMUNICATIONS, INC.,

Plaintiff,

Index No. 15-cv-01756 (KPF)

-v.-

RAVI CHOPRA; MAHENDRA SHAH; VIPIN  
SHAH; 728 MELVILLE PETRO LLC; KEDIS  
ENTERPRISES LLC; JMVD HILLSIDE LLC;  
NYC TELECOMMUNICATIONS CORP.; and  
SHALU SURI,

Defendants.

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### **NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon, and for the reasons stated in, Plaintiff Geo-Group Communications, Inc. (“GCI”)’s accompanying Memorandum of Law in Support of Motion to Reconsider Court’s September 25, 2020 Opinion and Order (Dk. 295), and upon all exhibits and papers filed in this action, Geo-Group will move this Court on a date convenient for the Court, or as soon thereafter as counsel may be heard, for an order pursuant to S.D.N.Y. Local Civ. R. 6.3, and the Court’s inherent power, reconsidering the Court’s September 25, 2020 Opinion and Order (Dk. 295), and upon reconsideration, modifying it to grant GCI leave to:

1. Assert claims for actual fraudulent conveyance against Sanjiv Chand (“Chand”) and 728 Melville Petro LLC (NYDOS # 4760640) concerning the \$460,000 transferred to the now-dissolved 728 Melville Petro LLC (NYDOS # 4644433); and

2. Assert claims for fraud on the court against Chand and the LLC Defendants, 728 Melville Petro LLC (NYDOS #4760640), Kedis Enterprises LLC, and JMVD Hillside LLC.

This Motion also seeks an order granting any other relief as may be appropriate and warranted in the circumstances.

PLEASE TAKE FURTHER NOTICE that, pursuant to S.D.N.Y. Local Civ. R. 6.1(b), answering papers must be served no later than October 23, 2020, that is, within fourteen days after service of GCI’s moving papers. Reply papers, if any, shall be served within seven days after service of the answering papers.

Dated: New York, New York  
October 9, 2020

Respectfully submitted,

By: /s/ Philip J. Loree Jr.  
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To: All Counsel of Record and All Parties  
via CM/ECF

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